

EASTMAIN RESOURCES INC.

Whistleblower Policy

Purpose

Eastmain Resources Inc. (the “**Corporation**”) has adopted certain policies, including a Code of Business Conduct and Ethics, which requires the observance of high standards of business and personal ethics in the conduct of all directors, officers and other employees of the Corporation. This Whistleblower Policy (this “**Policy**”) has been approved by the Board of Directors of the Corporation (the “**Board**”) to handle complaints, reports and concerns by any individual regarding (a) questionable accounting practices, inadequate internal accounting controls or coercion relating to auditing matters; (b) questionable work practices or work environments relating to health and safety; (c) actual or potential violations of any applicable law; and (d) other suspected wrongdoing, including conduct prohibited under the Code of Business Conduct and Ethics of the Corporation (each a “**violation**”).

Reporting Responsibility

It is the responsibility of all directors, officers and other employees to report violations or suspected violations in accordance with this Policy.

No Retaliation

No director, officer or other employee who, in good faith, reports or files a complaint concerning a violation or suspected violation shall suffer harassment, retaliation or any adverse employment consequence as a consequence of making such report or filing such complaint. Any individual who retaliates against another individual who has reported a violation or suspected violation in good faith is subject to discipline, up to and including termination of employment.

Acting in Good Faith

Any individual who reports or files a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made maliciously or in bad faith, or were knowingly false will be viewed as a serious disciplinary offense and any individual who reports or files a complaint on such a basis will be subject to discipline, up to and including termination of employment.

Handling of Reported Violations

Any individual with a concern or complaint regarding a violation or suspected violation relating to accounting matters (other than a concern or complaint relating to the Audit Committee) or relating to the Board Chair (as defined below) should submit their concern or complaint to the Chair of the Audit Committee of the Board (the “**Audit Committee Chair**” or the “**Chair**”, as applicable in the context) utilizing the DSA Whistleblower Integrity Hotline Service.

Any individual with a concern or complaint regarding a violation or suspected violation relating to all matters other than accounting matters (other than a concern or complaint relating to the Board Chair) or a concern or complaint regarding a violation or suspected violation relating to accounting matters relating to the Audit Committee should submit their concern or complaint to the non-executive Chairman of the Board (the “**Board Chair**” or the “**Chair**”, as applicable in the context) utilizing the DSA Whistleblower Integrity Hotline Service.

DSA Whistleblower Integrity Hotline Service through DSA Corporate Services Inc. operates a secure, confidential and anonymously facility and will forward the complaint to the appropriate Chair. The secure email transmission for DSA Whistleblower Integrity Hotline Service is integrityhotline@dsacorp.ca or by telephone 1-844-900-1001 in either French or English.

All complaints received will be considered carefully. Any complaint should provide sufficient details so that a reasonable investigation can be conducted.

If the appropriate Chair determines that the complaint is covered by this Policy, the Chair will undertake an investigation of the violation or suspected violation. In conducting the investigation, the Chair may engage internal or external legal, accounting, human resources or other advisors as the Chair considers advisable. The Chair shall have access to all books and records of the Corporation. The directors, officers, other employees and agents of the Corporation are expected to fully co-operate in the investigation. In conducting any investigation, the Chair will use reasonable efforts to protect the confidentiality of the complainant. Investigations will be conducted as quickly as possible, taking into account the nature and complexity of the complaint and the matters raised therein.

In circumstances of a complaint regarding violations or suspected violations by the Audit Committee Chair, the Board Chair will be responsible for investigating the complaint and the individual will report his or her findings to the Board. In circumstances of a complaint regarding violations or suspected violations by the Board Chair, the Audit Committee Chair will be responsible for investigating the complaint and the individual will report his or her findings to the Board. In circumstances of a complaint regarding violations or suspected violations by the Board as a whole, the Chief Executive Officer will be responsible for investigating such complaints and will report his or her findings to the Board.

Reporting to the Audit Committee

During each financial quarter of the Corporation, the Audit Committee Chair will obtain relevant information from the Board Chair and report to the Audit Committee of the Board and to the external independent auditor of the Corporation, the aggregate number, the nature and the outcome of the complaints received and investigated under this Policy. In addition, the Audit Committee Chair, with the assistance of the Board Chair, if applicable, shall promptly report to the Audit Committee of the Board and the Board any complaint that may have material consequences for the Corporation.

Review of this Policy

The Audit Committee of the Board will review this Policy periodically to determine whether this Policy is effective in providing appropriate procedures to report violations or suspected

violations, and recommend to the Board any amendments to this Policy. The Board shall review the amendments, approve the amended Policy and cause its distribution to all directors, officers, employees, consultants and contractors who attend Eastmain worksites.

Confidentiality

The Corporation will treat all complaints as confidential and privileged to the fullest extent permitted by law. You are encouraged to put your name on any complaint you make, but a complaint may also be made anonymously.

Approved: October 2016

Reviewed: December 2018